

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES OFFSHORE
LIMITED,

Petitioners,

v.

BAERFIELD DRILLING LLC,

Respondent.

13 Civ. 4932 ()
ECF Case

DECLARATION OF JOSEPH P. MOODHE IN SUPPORT OF THE
PETITIONERS' PETITION TO CONFIRM A FOREIGN ARBITRATION
AWARD

I, Joseph P. Moodhe, declare as follows:

1. I am a member of the law firm of Debevoise & Plimpton LLP, counsel to CIMC Raffles Offshore (Singapore) Limited and Yantai CIMC Raffles Offshore Limited (collectively, "CIMC Raffles"). I am fully familiar with the facts and circumstances underlying this action based on personal knowledge and a review of the files in my possession.

2. I make this Declaration to put before the Court certain exhibits related to the Petition to Confirm a Foreign Arbitration Award being filed today by CIMC Raffles.

3. Attached to this Declaration as Exhibit 1 is a true and correct copy of the reissued Interim Final Award dated June 28, 2013, and the reasons for the award.

4. Attached to this Declaration as Exhibit 2 is a true and correct copy of the Shipbuilding Contract ("SBC") entered into by the Parties on July 12, 2006.

5. Attached to this Declaration as Exhibit 3 is a true and correct copy of the London Maritime Arbitrators Association's 2006 Terms, effective on or about January 1, 2006.

6. Attached to this Declaration as Exhibit 4 is a true and correct copy of the Second Amendment to the SBC entered into by the Parties on September 12, 2006.

7. Attached to this Declaration as Exhibit 5 is a true and correct copy of the Seventh Amendment to the SBC entered into by the Parties on September 27, 2009.

8. Attached to this Declaration as Exhibit 6 is a true and correct copy of the Eighth Amendment to the SBC entered into by the Parties on May 24, 2010.

9. Attached to this Declaration as Exhibit 7 is a true and correct copy of Tribunal's Procedural Order No. 1 dated November 20, 2012.

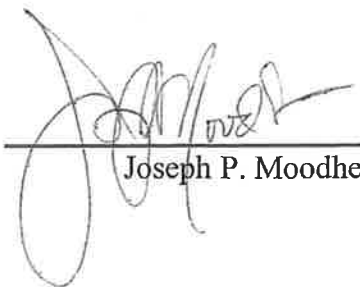
10. Attached to this Declaration as Exhibit 8 is a true and correct copy of the original Interim Final Award dated May 24, 2013, and the reasons for the award.

11. Attached to this Declaration as Exhibit 9 is a true and correct copy of a letter from the Tribunal letter to the Parties dated June 26, 2013.

12. Attached to this Declaration as Exhibit 10 is a true and correct copy of a letter from the Tribunal letter to the Parties dated June 27, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 15, 2013.



Joseph P. Moodhe

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v.

BAERFIELD DRILLING LLC

Respondent.

13 CIV 4932 (JSR)

AFFIDAVIT OF SERVICE

STATE OF DELAWARE

ss.:

COUNTY OF NEW CASTLE

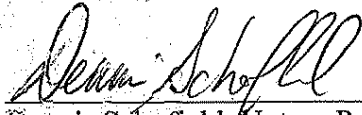
Daniel Sheehan, being duly sworn, deposes and says that I am not a party to the action, am over eighteen (18) years of age, and I reside in Wilmington, Delaware. That on July 17th, 2013, at 2:24 p.m. at 1209 Orange Street, Wilmington, Delaware 19801, I personally served true copies of the following documents:

- Summons
- Civil Cover Sheet
- Statement of Relatedness
- Petition to Confirm a Foreign Arbitration Award and for an Entry of Judgment
- Declaration of Joseph P. Moodhe in Support of the Petitioners' Petition to Confirm a Foreign Arbitration Award with Exhibits 1-10
- Memorandum of Law in Support of Petition to Confirm a Foreign Arbitration Award and for an Entry of Judgment
- CIMC Raffles' Disclosure Statements Pursuant to Fed. R. Civ. P. 7.1
- Yantai CIMC Raffles' Disclosure Statement Pursuant to Fed. R. Civ. P. 7.1

upon Baerfield Drilling LLC, c/o The Corporation Trust Company. The service was accepted by Melanie McGrath, Assistant Corporate Operations Manager.


Daniel Sheehan

Sworn to before me this
24th day of July, 2013

A handwritten signature in black ink, appearing to read "Dennis Schofield", written over a horizontal line.

Dennis Schofield, Notary Public

DENNIS SCHOFIELD
NOTARY PUBLIC
STATE OF DELAWARE
My commission expires Nov. 3, 2015